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*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CHAMPERY RENTAL REO, LLC, a  
California Limited Liability Company

Plaintiff(s),  
v.

ADAM W. POLSON, an individual;  
INTERNAL REVENUE SERVICE; WELLS  
FARGO BANK, N.A.; All other persons  
unknown claiming any right, title, estate, lien  
or interest in the real property described in the  
complaint adverse to Plaintiff's ownership, or  
any cloud upon Plaintiff's title thereto; DOES  
and ROES I through X, inclusive;

Defendant(s).

AND RELATED ACTIONS.

Civil No. 3:19-CV-00529-MMD-CLB

**STIPULATION TO DISMISS WELLS  
FARGO BANK, N.A. WITHOUT  
PREJUDICE**

Plaintiff/Counter-Defendant Champery Rental REO, LLC ("Champery"),  
Defendant/Counter-Plaintiff/Third-Party Plaintiff Adam W. Polson ("Polson"), Defendant  
Internal Revenue Service ("United States"), Defendant Wells Fargo Bank, N.A. ("Wells Fargo"),

1 and Third-Party Defendant Renovista Ridge Master Property Owners Association (“Renovista”)  
2 (collectively, the “Parties”), by and through their respective attorneys of record, hereby stipulate  
3 as follows:  
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5 IT IS HEREBY STIPULATED AND AGREED that Champery’s claims against Wells  
6 Fargo in this case are dismissed without prejudice.

7 IT IS FURTHER STIPULATED AND AGREED that Champery will not seek recovery  
8 of its attorneys’ fees and costs in this case from Wells Fargo.

9 IT IS FURTHER STIPULATED AND AGREED that Wells Fargo will not seek recovery  
10 of its attorneys’ fees and costs in this case from Champery.  
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Respectfully submitted this 21<sup>st</sup> day of January 2020.

HUTCHISON & STEFFEN, PLLC  
  
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Property Association*

**ORDER**

IT IS SO ORDERED:

  
UNITED STATES DISTRICT JUDGE

DATED: January 22, 2020